

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HAO ZHE WANG,

Plaintiff,

-against-

VERIZON COMMUNICATIONS INC., et al.,

Defendants.

Civil Action No.:1:19-CV-09506-JMF

**NOTICE OF MOTION TO DISMISS
AMENDED COMPLAINT, BY
DEFENDANTS:**

(1) VERIZON NEW ENGLAND INC.,
(2) VERIZON DIGITAL MEDIA
SERVICES INC., (3) VERIZON
COMMUNICATIONS INC.,
(4) VERIZON CONNECTED
SOLUTIONS INC., (5) VERIZON
NEW YORK INC., (6) VERIZON
LONG DISTANCE LLC,
(7) VERIZON SERVICES CORP.,
(8) VERIZON WIRELESS (VAW)
LLC, (9) VERIZON WIRELESS
SERVICES, LLC, (10) VERIZON
BUSINESS NETWORK SERVICES
INC., (11) VERIZON CAPITAL
CORP., (12) VERIZON CORPORATE
RESOURCES GROUP LLC,
(13) VERIZON CORPORATE
SERVICES GROUP INC.,
(14) VERIZON FEDERAL INC.,
(15) VERIZON SOURCING LLC,
(16). VERIZON SERVICES
ORGANIZATION INC.,
(17) VERIZON BUSINESS
PURCHASING LLC, (18) VERIZON
TURNKEY SERVICES LLC,
(19) VERIZON SELECT SERVICES
INC., (20) VERIZON ONLINE LLC,
(21) VERIZON CONNECT INC.,
(22) VERIZON CONNECT NWF INC.,
(23) VERIZON CREDIT INC.,
(24) VERIZON INFORMATION
TECHNOLOGIES LLC; AND
(25) VERIZON SERVICES
OPERATIONS INC.

Hon. Judge Jesse M. Furman

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law in Support, dated March 9, 2020, and upon all exhibits attached thereto, together with all pleadings, prior proceedings and directives had herein, Defendants: (1) Verizon New England Inc.; (2) Verizon Digital Media Services Inc.; (3) Verizon Communications Inc.; (4) Verizon Connected Solutions Inc.; (5) Verizon New York Inc.; (6) Verizon Long Distance LLC; (7) Verizon Services Corp.; (8) Verizon Wireless (VAW) LLC; (9) Verizon Wireless Services, LLC; (10) Verizon Business Network Services Inc.; (11) Verizon Capital Corp.; (12) Verizon Corporate Resources Group LLC; (13) Verizon Corporate Services Group Inc.; (14) Verizon Federal Inc.; (15) Verizon Sourcing LLC; (16). Verizon Services Organization Inc.; (17) Verizon Business Purchasing LLC; (18) Verizon Turnkey Services LLC; (19) Verizon Select Services Inc.; (20) Verizon Online LLC; (21) Verizon Connect Inc.; (22) Verizon Connect NWF Inc.; (23) Verizon Credit Inc.; (24) Verizon Information Technologies LLC; and (25) Verizon Services Operations Inc. (*hereinafter the* “Moving Defendants”), by its attorneys, Segal McCambridge Singer & Mahoney, Ltd., will move this Court, before the Honorable Jesse M. Furman, at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007, on a date and at a time to be designated by the Court, for an Order:

- 1) Granting the Moving Defendants’ Motion to Dismiss Plaintiff’s Amended Complaint for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6);
- 2) Dismissing all claims set forth in Plaintiff’s Amended Complaint as against the Moving Defendants; and
- 3) For such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that all answering papers, if any, are to be served in accordance with the Local Rules of this Court.

There has been no prior request for the relief sought herein.

Dated: New York, New York
March 9, 2020

**SEGAL MCCAMBRIDGE
SINGER & MAHONEY, LTD.**

By: /s/Andrew P. Kates
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